

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA**

HUNTER CREGER, individually and on  
behalf of all others similarly situated, *et al.*

*Plaintiffs,*

v.

UNITED LAUNCH ALLIANCE, LLC;

*Defendant.*

Civil Action No.:  
5:21-cv-01508-AKK

**AFFIDAVIT OF MATTHEW J. CLARK**

I, Matthew J. Clark, declare as follows:

1. I am Counsel for Plaintiffs in this above action.

2. On Monday, December 6, 2021, several of my clients in this case were notified by the Alabama Department of Labor that their appeals of the denials by Defendant United Launch Alliance (“ULA”) of their claims for religious and/or medical exemption from ULA’s vaccine mandate had been granted, that the denials were overruled, and that my clients “qualif[ied] for a COVID-19 vaccination mandate.” True and correct copies of several of those email notifications are attached hereto as Exhibit A.

3. I tried for several days to contact counsel for ULA to ascertain how ULA intended to respond to the rulings by the ALJ, and also sent them an email on Friday, December 10, 2021. I did not receive a return call until Wednesday, December 15, 2021, during which counsel for ULA advised me that it did not intend to comply with the ALJ ruling.

4. On Wednesday, December 15, 2021, several of the Plaintiffs in this case (Plaintiffs Creger and Breland, and as well as at least one putative class member) who were still on unpaid administrative leave pending resolution of their union grievance advised me or my co-counsel that they had received notification from ULA that exit interviews were being scheduled this week to terminate their employment.

I declare under penalty of perjury that the foregoing is true and correct.

December 15, 2021

Date

/s/ Matthew J. Clark

Matthew J. Clark

## **EXHIBIT A**